

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

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| IN RE: AFTERMARKET FILTERS | : | Master Docket No. 08-cv-4883 |
| ANTITRUST LITIGATION | : | MDL Docket No. 1957 |
| | : | |
| This Document Relates to | : | Judge Robert W. Gettleman |
| All Direct Purchaser Actions | : | Magistrate Geraldine Soat Brown |
| | : | |

**DIRECT PURCHASER PLAINTIFFS' UNOPPOSED MOTION
FOR LEAVE TO FILE BRIEF IN EXCESS OF PAGE
LIMITATIONS AND UNDER SEAL**

Direct Purchaser Plaintiffs (“Plaintiffs”) move this Honorable Court for leave to file Plaintiffs’ Omnibus Memorandum of Law in Opposition to Defendants’ Motions: (1) To Exclude William G. Burch’s Tape Recordings; (2) To Exclude William G. Burch’s Testimony; and (3) For an Evidentiary Hearing (“Memorandum”) in excess of the 15-page limit set by Local Rule 7.1 and under seal. Defendants do not oppose Plaintiffs’ Motion. In support of their unopposed Motion, Plaintiffs state as follows:

1. Plaintiffs request in excess of 15 pages to respond to Defendants’ Motions: (1) To Exclude William G. Burch’s Tape Recordings; (2) To Exclude William G. Burch’s Testimony; and (3) For an Evidentiary Hearing. Plaintiffs are submitting their single Memorandum that responds to three separate motions. Moreover, Plaintiffs’ Memorandum includes a substantial statement of evidence in response to a specific request from the Court.

2. Additionally, Plaintiffs request leave to file under seal Plaintiffs’ Memorandum. The Memorandum and corresponding exhibits include discussion and excerpts of documents that Defendants designated as highly confidential.

3. Accordingly, Plaintiffs respectfully ask the Court for leave to file Plaintiffs' Memorandum in a length exceeding 15 pages, but no more than 60 pages, and under seal.

4. Defendants do not oppose Plaintiffs' Motion.

WHEREFORE, Plaintiffs respectfully request that this Court grant them leave to file Plaintiffs' Omnibus Memorandum of Law in Opposition to Defendants' Motions: (1) To Exclude William G. Burch's Tape Recordings; (2) To Exclude William G. Burch's Testimony; and (3) For an Evidentiary Hearing in a length exceeding 15 pages, but no more than 60 pages, and under seal.

Dated: September 22, 2011

Respectfully submitted,

/s/ Michael J. Freed
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